

Warrington Local Plan EiP

Matter 14: Monitoring and Review

On behalf of Taylor Wimpey, Bloor Homes and Lone Star Land. Date: 05 August 2022 | Pegasus Ref: P2O-3147 / R013v2 / PL

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1. Matter 14 – Monitoring and Review

Q1. How will the implementation and effectiveness of the Local Plan be monitored? Will the monitoring framework in Appendix 2 provide an effective basis to do this?

1.1. We will comment at the hearing session further to seeing the Council's response to this.

Q2. How will any issues of delivery of housing be identified and addressed? Will this be effective?

1.2. We will comment at the hearing session further to seeing the Council's response to this.

Q3. How will any issues of delivery of the Main Development Areas be identified and addressed? Will this be effective?

- 1.3. Further to point 4 under Policy M1, we consider the Submitted Local Plan is at significant risk with regard to this matter and the delivery of essential infrastructure required to realise the Spatial Strategy of the plan.
- 1.4. As raised throughout our representations and hearing statements, we have demonstrated that the proposed individual allocations for the South East Warrington Urban Extension and South East Warrington Employment Area will not delivery the necessary highway and public transport infrastructure required in the south of Warrington required to:
 - encourage model shift,
 - reduce car dependency,
 - provide greater equality for certain groups to access key employment areas in south Warrington and greater opportunities for those living in south Warrington and beyond to access the town centre by more sustainable modes; and
 - avoid severe highway impacts on the local highway network.
- 1.5. The proposals put forward within the Submission Local Plan do not adhere to the transport strategy that was adopted in the Local Transport Plan (LTP4) and there is no review mechanism within the Submitted Local Plan to allow for the full delivery of the envisaged mass transit routes set out within LTP4 and in other parts of the Submitted Local Plan.
- 1.6. Indeed, the Council do not seek to safeguard specific routes (which we note is one of the Targets for Policy INF2 in Appendix 2 of the pan) and whilst it is stated applications will be monitored there is a real danger that independent applications in South Warrington could actually jeopardise any future delivery of the Mass Transit route through this part of the town envisaged by LTP4.
- 1.7. Should no change be made to the Submitted Local Plan as per our suggestions made elsewhere and it becomes clear through the preparation of the South East Warrington Urban Extension Development Framework SPD; and/or the determination of planning applications associated with these allocations; and/or at any other time during the plan period, that it is necessary to identify additional land to ensure this infrastructure and



connections can be delivered, there is no mechanism within this plan to remedy that situation. The suggestion at Point 4 is a review or partial review of the Local Plan.

- 1.8. However, under those circumstances, which are entirely conceivable given the content of LTP4 and the fact that the two independent allocations in south Warrington do not include all of the land necessary, not only would a full Local Plan review be necessary, a further, immediate Green Belt review and release would be necessary in order to release the necessary land for development that would fund the required infrastructure.
- 1.9. That approach is entirely at odds with LTP4 and paragraphs 22 and 143 of the NPPF relating to the need for strategic policies to look ahead to **'at least 30 years'** when considering the infrastructure requirements of new settlements or significant extensions and the approach to reviewing Green Belt boundaries in order to meet **'longer-term development needs** stretching well beyond the plan period'.
- 1.10. Our position is that the full Garden Suburb allocation should be re-instated into the Local Plan as a major modification to remove and address this issue.
- 1.11. Should this suggested change not be endorsed by the Inspector or Council, the only alternative option would be to safeguard the necessary land as per paragraph 143c of the NPPF to deliver the mass transit routes including the remaining land previously identified under the former Garden Suburb proposals to ensure the necessary infrastructure can be funded by development.
- 1.12. Clauses could be placed within the necessary safeguarded policies to allow the land to be released under certain circumstances (as advised by the Monitoring Policy) or failing that an 'update to the plan' (as per paragraph 143d of the NPPF). The clear difference/benefit compared to the Council's submitted approach would be the omission of having to undertake a full Local Plan review and critically a further Green Belt review/boundary change would not be necessary, which is clearly advised against in paragraph 143 of the NPPF and particularly part e that confirms the Council must be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. This has not been demonstrated in this case and therefore the Submitted Plan is deemed unsound and not consistent with the NPPF.

Q4. What is the overall approach to reviewing the Local Plan?

1.13. We will comment at the hearing session further to seeing the Council's response to this.

Q5. Are any main modifications to Policy M1 necessary for soundness?

- 1.14. All points raised above under Q3 apply.
- 1.15. We also consider points 5 and 6 under Policy M1 are not sufficiently robust enough to address the above issue. At the very least, a further point (7) should be added that reflects point 4 and states:

'Where there is an identified risk to delivery of infrastructure essential to delivering a Main Development Allocation, this will trigger the need for the consideration of a review or partial review of the Local Plan.'



1.16. The monitoring criteria target and indicators under Annex 2 for the various strategic allocation (policy MD2 in particular on page 276) should also be amended to account for infrastructure delivery and the safeguarding/preservation of necessary land and particularly connection points between ownership boundaries to allow for the delivery of key infrastructure requirements into the future.



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